

Rory Valas

From: Rory Valas [rav@franchiseelaw.com]
Sent: Wednesday, April 16, 2008 9:15 AM
To: 'Danielle M. Kays'
Subject: FW: Deposition for Kumon

Danielle:

We understand that you sent a letter threatening Ms. Kelley with contempt despite the fact that she told you twice that she was not available until after 3 pm tomorrow (see below). You did not even copy me on your message to Ms. Kelley. Also, I will not be available until Thursday afternoon. Please let us know this morning if the deposition of Ms. Kelley will go forward at 3:30 pm or not at all Thursday.

We also again ask that Kumon make a computer and the working E-file program available for the Rule 30(b)(6) computer deposition. We need confirmation this morning.

Thank you.

Rory Valas

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Rory Valas is a member of the Massachusetts bar. He is not licensed in Virginia or New Jersey .

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IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE LET US KNOW AND DESTROY THIS MESSAGE. THANK YOU.

From: Christina Kelley [mailto:ckelley25@sbcglobal.net]
Sent: Tuesday, April 15, 2008 5:25 PM
To: rav@franchiseelaw.com
Subject: Thursday Deposition for Kumon

4/30/2008

The day and time for my deposition was recently changed, however, I need to have my time changed to 3:30 or 4:00 pm on Thursday, April 17. I was not given enough notice to take the day off of work, so I will not be able to make it until after 3:30 pm. Thank you.

Christina Kelley

From: Christina Kelley [mailto:ckelley25@sbcglobal.net]

Sent: Friday, April 11, 2008 5:51 PM

To: rav@franchiseelaw.com

Subject: Deposition for Kumon

I received the subpoena to appear for my deposition very late on Thursday, April 10. I am unable to appear on such short notice. I work full time as a teacher assistant Monday - Friday from 8:00 AM to 3:00 PM. My students have a math test on Tuesday, April 12, that is required to be read to them as part of their IEP. I do not get a substitute to fill in for me. Also, I need to provide at least 3 business days notice in order to take a personal day. I would be able to appear on Thursday, April 14 if possible. Is there any way to move the location to the Hoffman Estates area instead of Chicago? It is very inconvenient for myself and others to travel there when we all live out here. The current location is about 50 miles from where I live, which would take 2 to 3 hours with any type of traffic. Thank you for your time.

Christina Kelley
10708 Oregon Trail
Huntley, IL 60142

4/30/2008